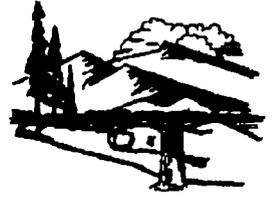




# Department of Environmental Quality

To protect, conserve and enhance the quality of Wyoming's environment for the benefit of current and future generations.



Matthew H. Mead, Governor

Todd Parfitt, Director

February 28, 2013

Mr. Ken Garoutte  
Cameco Resources  
P.O. Box 1210  
Glenrock, WY 82637

**RE: TFN 5 1/380, Highland Plant Renovation Review  
Permit 603, Cameco Resources (CR)**

Dear Mr. Garoutte:

The Land Quality Division (LQD) received a copy of the *Phase II Highland Plant Renovation* report on January 13, 2012. To date, CR has not provided LQD with a proposal for the update to Permit 603 addressing the renovation. The enclosed review addresses the requirements that will need to be included in a permit revision prior to use of the renovated facility.

If you have any questions, please contact me at [pam.rothwell@wyo.gov](mailto:pam.rothwell@wyo.gov) or 777-7048.

Sincerely,

Pam Rothwell  
District 1 Assistant Supervisor  
Land Quality Division

Enclosure

cc: Cameco Resources, Cheyenne, WY  
Doug Mandeville, NRC



## TFN 5 1/380, HIGHLAND PLANT RENOVATION

### PERMIT 603, CAMECO RESOURCES (CR)

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#### INTRODUCTION

The Land Quality Division (LQD) received a copy of the *Phase I Highland Plant Renovation* report that was sent to the Nuclear Regulatory Commission (NRC) on September 15, 2011. LQD provided a letter to CR dated October 26, 2011 expressing concerns for potential needs for additional restoration operations for MU-A and MU-B which may require the existing Highland Processing Plant. CR provided formal response to the concern in a letter dated January 20, 2012. CR explained that the former HUP Processing Facility was never utilized for MUs A and B restoration and therefore, would not be needed if additional restoration becomes necessary.

LQD received a copy of the *Phase II of the Highland Plant Renovation* report on January 13, 2012 which was again sent to NRC. CR has not developed a proposed permit revision for Permit 603 that describes the changes to the facility. Therefore, a review of the report sent to NRC to address Source Material License SUA-1548, Docket Number 40-8964 is reviewed for content relevant to the LQD.

#### SUMMARY

Cameco Resources is re-habilitating their Highland processing plant to receive toll shipments of resin and resin from their satellite facilities. Though it isn't stated, the Cameco satellite facilities would most likely include the facilities at Ruth, North Butte and Gas Hills. The majority of the renovation plan is within the NRC's jurisdiction, however, a Non-significant revision is necessary to update Permit 603 with the changes to the facility.

#### COMMENTS

- 1 CR will need to provide a permit revision with a text discussion of the Highland Processing Plant (Chapter 3, Section 2(b)(i)(A)). The discussion should include water usage associated with the facility and any required disposal capacity (i.e. identified deep disposal wells). An updated water balance may be warranted to adequately address the water resource associated with the facility. Please include a map/design of the facility for reference to surety requirements to dismantle and reclaim the facility. **(PCR)**
- 2 The volume of water used in the decontamination process may affect the restoration water balance. Please provide assurances that disposal of the waste water used in the decontamination process will not affect the restoration water balance. If water usage will impact the water balance, provide an updated restoration water balance with the revision. **(SI/PCR)**
- 3 The operational waste water disposal may also affect the restoration water balance. Please provide assurances that the operational waste water disposal will not affect the

restoration water balance. If water usage will impact the water balance, provide an updated restoration water balance with the revision. **(SI/PCR)**

- 4 The plan indicates that an existing permitted well will be used to provide water for decontamination. Cameco should verify with the State Engineer's permit for this well to ensure that the volume and proposed use is allowed under the SEO permit. No response necessary. **(SI)**
- 5 Please provide an update to permit text according to Chapter 2, Section 2(b)(iii)(H) and Chapter 11, Section 5(a)(ix), requiring a plan for the disposal of buildings and structures erected, use or modified. **(PCR)**
- 6 Please provide an update to the permit text according to Chapter 2, Section (2)(b)(iii)(G) requiring a classification and description, including an updated map of roads, shipping areas and rights-of-way to be built or utilized by the facility. **(PCR)**
- 7 Please update the surety estimate for review of the reclamation costs associated with the facility according to Chapter 11, Section 5(a)(xiii)(A). **(PCR)**